

EXHIBIT D

USDC SDNY

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DOC #:

DATE FILED:

5/9/23

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK----- x
E. JEAN CARROLL,

Plaintiff,

-against-

22-cv-10016 (LAK)

DONALD J. TRUMP,

Defendant.

----- x

VERDICT FORM

Battery

Did Ms. Carroll prove, by a preponderance of the evidence, that

1. Mr. Trump raped Ms. Carroll?

YES _____

NO *[If you answered "Yes," skip to Question 4. If you answered "No," continue to Question 2.]*2. Mr. Trump sexually abused Ms. Carroll?YES

NO _____

*[If you answered "Yes," skip to Question 4. If you answered "No," continue to Question 3.]*3. Mr. Trump forcibly touched Ms. Carroll?

YES _____

NO _____

*[If you answered "Yes," continue to Question 4. If you answered "No," skip to Question 6.]*4. Ms. Carroll was injured as a result of Mr. Trump's conduct?YES

NO _____

If "Yes," insert a dollar amount that would fairly and adequately compensate her for that injury or those injuries.

\$ 2,000,000 - (2 million)

If "No," insert \$1.

\$ _____

[Continue to Question 5, whether you answered "Yes" or "No."]

5. Mr. Trump's conduct was willfully or wantonly negligent, reckless, or done with a conscious disregard of the rights of Ms. Carroll, or was so reckless as to amount to such disregard?

YES NO _____

If "Yes," how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ 20,000 - (twenty thousand)

[Continue to Question 6, whether you answered "Yes" or "No."]

Defamation

Did Ms. Carroll prove, by a preponderance of the evidence, that

6. Mr. Trump's statement was defamatory?

YES NO _____

[If you answered "Yes," continue to Question 7. If you answered "No," stop here and return your verdict.]

Did Ms. Carroll prove, by clear and convincing evidence, that

7. Mr. Trump's statement was false?

YES NO _____

[If you answered "Yes," continue to Question 8. If you answered "No," stop here and return your verdict.]

8. Mr. Trump made the statement with actual malice?

YES NO _____

[If you answered "Yes," continue to Question 9. If you answered "No," stop here and return your verdict.]

Did Ms. Carroll prove, by a preponderance of the evidence, that

9. Ms. Carroll was injured as a result of Mr. Trump's publication of the October 12, 2022 statement?

YES NO

If "Yes," insert a dollar amount for any damages other than the reputation repair program.

\$ 1,500,000. - (1 million)

If "Yes," insert a dollar amount for any damages for the reputation repair program only.

\$ 1,760,000. - (1.7 million)

If "No," insert \$1.

\$ 1

[Continue to Question 10, whether you answered "Yes" or "No."]

10. In making the statement, Mr. Trump acted maliciously, out of hatred, ill will, spite or wanton, reckless, or willful disregard of the rights of another?

YES NO

If "Yes," how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ 280,000. - (two hundred eighty thousand)

[Please write your juror number (not your seat number or name) in the space provided below, fill in the date, and inform the officer that you have reached a verdict.]

Dated: 5/9, 2023

Juror numbers:

10

58

37

77

39

80

44

81

48